

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

JEFFREY M. GOLDMAN,

Plaintiff,

v.

SOL GOLDMAN INVESTMENTS LLC, SOLIL  
MANAGEMENT, LLC and JANE H. GOLDMAN,  
,

Defendants.

No. 1:20 cv 06727

**PLAINTIFF'S INITIAL DISCLOSURES**

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Plaintiff hereby provides his initial disclosures. Plaintiff bases these disclosures on the information reasonably available to him at this time and submits them without waiving any objections as to relevance, materiality, or admissibility of evidence in her action. Plaintiff reserves the right at any time to revise, correct, add to, or clarify the disclosures set forth herein, consistent with Rule 26(e) of the Federal Rules of Civil Procedure.

**A. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION.**

Upon information and belief, Plaintiff submits that the following individuals may have discoverable information that Plaintiff may use to support her claims:

1. Plaintiff.

c/o Plaintiff's Counsel.

Plaintiff may have knowledge regarding the nature of his work relationship with Defendants, the facts and circumstances surrounding the allegations in his Complaint, and the damages suffered as a result of Defendants' actions.

2. Defendant Jane H. Goldman

c/o Defendants' Counsel.

Defendant Jane H. Goldman may have knowledge concerning Plaintiff's job duties and performance; the facts and circumstances surrounding some of the allegations in the Complaint, including the circumstances under which Plaintiff's employment terminated.

3. Judith M. Brener.

c/o Defendants' Counsel.

Ms. Brener may have knowledge concerning Plaintiff's job duties and performance; the facts and circumstances surrounding some of the allegations in the Complaint, including the circumstances under which Plaintiff's employment terminated.

4. Dr. Doron Katz.

c/o Plaintiff's Counsel.

Dr. Katz may have knowledge concerning Plaintiff's underlying health conditions.

5. All individuals identified in Defendants' initial disclosures.

**B. RELEVANT DOCUMENTS**

Plaintiff submits that he may use the following documents that are in his possession to support his claims.

1. Certain email correspondence from Defendants to Plaintiff.
2. Unemployment records.

**C. DAMAGES**

Plaintiff will seek the following categories of damages. The amounts shown are estimates as of the date of these Initial Disclosures and are subject to change based on the passage of time and/or information learned in discovery.

Plaintiff will seek a minimum of five years of compensation, or \$950,000, as front pay. Plaintiff will also seek back pay (currently, approximately 6 months of his annual salary, or \$94,999.98). Further, Plaintiff will seek emotional distress damages, attorneys' fees and punitive

damages for his claims brought under the NYCHRL. Plaintiff's emotional distress damages will be at least \$150,000. Under the ADA, Plaintiff is entitled to liquidated damages in the amount of his back pay. Attorneys' fees and punitive damages must be determined at trial.

<b>Damages</b>	<b>Amount</b>
Back Pay: 6 Months	$(\$15,833.33 \times 6) = \$94,999.98$
Liquidated Damages: 6 Months	\$94,999.98
Front Pay: 5 Years	\$950,000
Emotional Distress:	\$150,000
Attorneys' Fees:	TBD
Punitive Damages:	TBD

Should it become relevant and disputed, Plaintiff will make available for inspection and copying by Defendants all applicable documents and materials in his possession supporting the computation of damages.

#### **D. INSURANCE AGREEMENT**

Not applicable.

Dated: New York, New York  
December 30, 2020

By: /s/ D. Maimon Kirschenbaum  
D. Maimon Kirschenbaum  
JOSEPH & KIRSCHENBAUM LLP  
32 Broadway, Suite 601  
New York, NY 10004

*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that in accordance with the Federal Rules of Civil Procedure and the Southern District Local Rules, I caused a copy of the foregoing document to be served via e-mail on December 30, 2020 on the following attorneys for Defendants:

Ansell Grimm & Aaron, P.C

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*Attorneys for Defendants*

Dated: New York, New York  
December 30, 2020

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